

SINCE 1848

The Knapheide Mfg. Co. = 436 South Sixth Street = P. O. Box C-140 = Quincy, Illinois 62306-2140 TEL: (217) 222-7131 = FAX: (217) 222-5939 OR (800) 654-8997

April 6, 1995

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MR RUBEN MCCULLERS
ENVIRONMENTAL SCIENTIST
U.S. EPA, REGION VII
726 MINNESOTA AVENUE
KANSAS CITY KANSAS 66101

RCOM SECTION

RE: CONSENT AGREEMENT (VII-92-H-0008 AND VII-93-T-499-E)

PROGRESS REPORT; 4-7-95 THRU 5-7-95

Dear Ruben:

This Progress Report is being provided pursuant to paragraph 8 of the First Modification to Consolidated Consent Agreement and Order, as referenced above.

- New Facility. Knapheide has purchased land for its new facility to be constructed in Quincy, Illinois, and is currently in the process of designing the facility. Our major focus in the last 30 days has been continued investigation of the technology of metal finishing and reduction of emissions. Knapheide has retained the McClier Consulting Company to assist us in the production process planning phase and we have been exploring alternate paint technologies, concentrating on the following three areas:
 - a. "E"-Coat. We have narrowed our equipment vendor list to two companies and have made several trips to observe systems in actual production. Both companies have a conceptual design and have submitted dollar quotes. We have also performed an experimental application of "E"-Coat paint to our products through an "E"-Coat paint system at another existing facility.
 - b. Powder Paint. We are currently evaluating two equipment vendors and various material suppliers. We have also performed an experimental application of power paint to our products at other existing facilities.



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- c. Water-Born Paint. We are continuing our investigations of appearance and reliability with two material vendors.
- 2. Closure Plan. We have received approval of our closure plan from Missouri Department of Natural Resources and are implementing the plan. The implementation includes ongoing sampling at various stages.
- 3. SEP Plan. We are formulating the SEP Plan, which will be submitted in accordance with the required timetable.
- 4. SEPS. We are also preparing for your review various SEP submissions in accordance with the Modification Agreement, and will be submitting the SEPs per the required timetable.

If you have any questions or I can be of further help, please call.

Sincerely,

THE KNAPHEIDE MFG. CO.

Harold Huggins

Facilities and Environmental Engineering Manager

HH:dd

cc: Sandra Oberkfell, Esq.

Dan Punzak, IEPA Tom Judge, MDNR

Gerry, Vice President Operations